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DUE  
DATE



Department of Energy

ROCKY FLATS OFFICE  
P.O. BOX 928  
GOLDEN, COLORADO 80402-0928

JAN 22 1993

92-DOE-00976

ACTION

DIST.	LTR	ENC
BENEDETTI, R.L.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
BENJAMIN, A.	<input type="checkbox"/>	<input type="checkbox"/>
BERMAN, H.S.	<input type="checkbox"/>	<input type="checkbox"/>
CARNIVAL, G.J.	<input type="checkbox"/>	<input type="checkbox"/>
CORDOVA, R.C.	<input type="checkbox"/>	<input type="checkbox"/>
CROUCHER, D.W.	<input type="checkbox"/>	<input type="checkbox"/>
DAVIS, J.G.	<input type="checkbox"/>	<input type="checkbox"/>
FERRERA, D.W.	<input type="checkbox"/>	<input type="checkbox"/>
HANNI, B.J.	<input type="checkbox"/>	<input type="checkbox"/>
HEALY, T.J.	<input type="checkbox"/>	<input type="checkbox"/>
HEDAH, T.G.	<input type="checkbox"/>	<input type="checkbox"/>
HILBIG, J.G.	<input type="checkbox"/>	<input type="checkbox"/>
IDEKER, E.H.	<input type="checkbox"/>	<input type="checkbox"/>
KIRBY, W.A.	<input type="checkbox"/>	<input type="checkbox"/>
KUESTER, A.W.	<input type="checkbox"/>	<input type="checkbox"/>
LEE, E.M.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
MANN, H.P.	<input type="checkbox"/>	<input type="checkbox"/>
MARX, G.E.	<input type="checkbox"/>	<input type="checkbox"/>
MCKENNA, F.G.	<input type="checkbox"/>	<input type="checkbox"/>
MORGAN, R.V.	<input type="checkbox"/>	<input type="checkbox"/>
PIZZUTO, V.M.	<input type="checkbox"/>	<input type="checkbox"/>
POTTER, G.L.	<input type="checkbox"/>	<input type="checkbox"/>
RILEY, J.H.	<input type="checkbox"/>	<input type="checkbox"/>
SANDLIN, N.B.	<input type="checkbox"/>	<input type="checkbox"/>
SATTERWHITE, D.G.	<input type="checkbox"/>	<input type="checkbox"/>
SCHUBERT, A.L.	<input type="checkbox"/>	<input type="checkbox"/>
SETLOCK, G.H.	<input type="checkbox"/>	<input type="checkbox"/>
SHEPLER, R.L.	<input type="checkbox"/>	<input type="checkbox"/>
SULLIVAN, M.T.	<input type="checkbox"/>	<input type="checkbox"/>
SWANSON, E.R.	<input type="checkbox"/>	<input type="checkbox"/>
WILKINSON, R.B.	<input type="checkbox"/>	<input type="checkbox"/>
WILSON, J.M.	<input type="checkbox"/>	<input type="checkbox"/>
ZANE, J.O.	<input type="checkbox"/>	<input type="checkbox"/>

Mr. Martin Hestmark  
U. S. Environmental Protection Agency, Region VIII  
ATTN: Rocky Flats Project Manager, 8HWM-RI  
999 18th Street, Suite 500, 8WM-C  
Denver, Colorado 80202-2405

Mr. Gary Baughman  
Hazardous Waste Facilities Unit Leader  
Colorado Department of Health  
4300 Cherry Creek Drive South  
Denver, Colorado 80222-1530

Gentlemen:

The Department of Energy, Rocky Flats Office (DOE, RFO) has reviewed your letter of January 4, 1993, "Failure to Comply with IAG Milestones, OU-4 IM/IRA Decision Document", regarding the schedule for the April 1992, Interim Measure/Interim Remedial Action (IM/IRA) for the Rocky Flats Plant Solar Ponds.

We note that the IM/IRA in question is not included in the Interagency Agreement (IAG) Table 6 enforceable milestones. In fact the introduction to the IM/IRA Decision Document, page 1-1 states: "This IM/IRA document is not related to the IM/IRA as referenced in the IAG.. Pondcrete operations are addressed in the Agreement in Principle (AIP), not the IAG.." We are, however, providing the schedule information you requested in your letter.

Two sets of dates are provided. Attachment 1 provides the revised dates for the IM/IRA Table 3.2 construction and operation activities (that is, for the last four milestones in Table 3.2). This format is provided for clarity, so the dates can be directly related to those in the IM/IRA Decision Document. Attachment 2 provides dates for the six activities listed in your letter of January 4, 1993. Attachment 3 lists the assumptions which provide a basis for our projected dates and several issues which have the potential of shortening or lengthening the schedule.

The objectives of the IM/IRA are: (1) to cease the addition of water from the Interceptor Trench system (ITS) to the Solar Ponds and (2) to remove excess pond water as expeditiously as possible in order to proceed with the assessment and closure of OU-4.

CORRES CONTROL	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
TRAFFIC	<input type="checkbox"/>	<input type="checkbox"/>

Reviewed for Addressee  
Corres. Control RFP

1-25-93 *Cia*  
DATE BY

Ref Ltr. #

JAN 22 1993

The schedule for diverting the Interceptor Trench Water to the surge tanks can be compressed if we modify the modular tank design to delete the .020" ultraviolet protection internal liners. We must remove these liners to repair leaks in all 3 tanks. According to the material manufacturer, the underlying .080" liners are warranted for a 20 year life without any uv protective liner. By not replacing the .020 liners, we will save nine days of time from the critical path. Furthermore, this will improve our ability in the future to conclusively determine the integrity of the primary .080" liners. When present, the .020" liners act as a bladder, which can mask defects in the underlying .080" liners. We strongly recommend that you support our position in this matter and support this modification to the IM/IRA. We are eager to discuss this matter further with you.

The second IM/IRA objective involves the removal of "excess water" from the ponds. Excess water is the amount of water in excess of that which is needed to suppress airborne suspension of sludge (approximately 2 inches) and to allow for pond sludges to be transferred efficiently into the cementation treatment unit (when that unit becomes operational). Currently, pond 207 C has no excess water since its contents are saturated brine and crystalline salts (which will require the addition of water for effective pumping and cementation). Precipitation additions to the C pond are balanced by evaporative losses. The 207 B series ponds currently contain roughly 230,000 gallons of sludge and 1.7 million gallons of water. After the contents are consolidated into one pond, which is our current intention, about 1.4 million gallons of this water will be considered excess.

Water is currently added to the B ponds from the Interceptor Trench System and from precipitation into the A and B ponds; which is then consolidated into pond B north. We have been pumping this water from the A and B ponds to the Building 374 evaporator for a number of years. We plan to divert the ITS water from the B ponds in April, following which we would remove all "excess water" and accumulated precipitation from the ponds by the end of February 1994. This water will be removed by transfer through existing pipeage from the ponds to the Building 374 evaporator. The Building 910 evaporator will be used primarily to process ITS water and will process pond water only as a contingency. Because precipitation will result in addition of water to the ponds, the consolidation and removal of additional excess water to pond B south will be a continuing intermittent task until the final OU-4 remedy is implemented. My staff will be happy to discuss excess water management with you further.

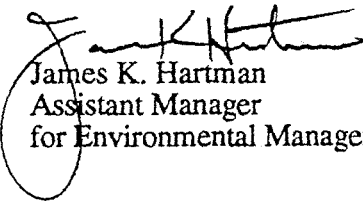
In response to your request for technical justification for the dates in Attachment 2, a number of factors have contributed to the schedule: technical difficulties with the Building 910 generators, the application of appropriately tailored disciplined operations to the entire system, leaks in all three of the modular tanks which must be repaired, and the anticipated effects of freezing weather on tank repair and startup operations, both of which involve water. I believe it would be best for my staff to meet with yours to further explain the revised schedule and answer your questions interactively.

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With regard to your concern that we have not reported on the IM/IRA activity in sufficient detail in the Environmental Restoration Program Monthly Report, we agree that better communication on the Solar Ponds Remediation Program is needed. In the past we have included only summary information concerning the IM/IRA, because the report focused primarily in IAG activities. Despite the lack of formal connection to the IAG, we agree that as a matter of administrative efficiency, it would be better to report in detail on the entire Solar Ponds Remediation Program in the Environmental Restoration Program Monthly Report, and we will do so beginning with the report for January 1993.

DOE appreciates the time your staff has spent discussing the restructuring of the Solar Ponds Program with Rocky Flats personnel. We would like to meet with you and your staff on Wednesday morning, January 27, 1993, to discuss the details of the above items. Please contact Frazer Lockhart on 966-7846 to confirm if this meeting would be convenient or to make other arrangements.

Sincerely,



James K. Hartman  
Assistant Manager  
for Environmental Management

Enclosures (3)

cc w/Enclosures:  
R. Greenberg, EM-453  
R. Harris, EM-453  
R. Nelson, OOM, RFO  
J. Hartman, AMEM, RFO  
F. Lockhart, ERD, RFO  
R. Craun, CED, RFO  
R. Benedetti, EG&G  
E. Lee, EG&G  
R. Boyle, EG&G  
F. Dowsett, CDH  
H. Ainscough, CDH